

1 Marc Wolstenholme
2 5 Shetland Close
3 Coventry, England CV5 7LS
4 Telephone: 044 7827964404
5 Email: marc@mvwolf-fiction.co.uk
Plaintiff in Pro Per

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CLERK, U.S. DISTRICT COURT
3/17/25
CENTRAL DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

PLAINTIFF MARC WOLSTENHOLME'S NOTICE TO COMPLY WITH PREREQUISITE REQUIREMENTS FOR SETTLEMENT DISCUSSIONS AND NOTICE OF RIOT GAMES' LEGAL TEAM'S DELIBERATE ATTEMPTS TO MANIPULATE COURT PROCEEDINGS

Dated this: March 17th, 2025

M. WOLSTENHOLME.
[MARC WOLSTENHOLME]

**TO THE HONORABLE COURT, ALL PARTIES, AND THEIR
ATTORNEYS OF RECORD:**

Plaintiff Marc Wolstenholme respectfully submits this Notice to Comply regarding the upcoming Settlement Conference as ordered by the Court. While Plaintiff is fully willing to engage in meaningful settlement discussions in good faith, it is premature to proceed with the settlement conference until Defendant Riot Games, Inc. ("Riot") fulfills its prerequisite obligations necessary to ensure that the settlement conference serves its intended purpose.

Furthermore, Plaintiff brings to the Court's attention that Riot's legal team has deliberately provided false and misleading information to the Court to manipulate legal proceedings, falsely characterizing Plaintiff's position as a refusal to engage in settlement discussions when in reality, Plaintiff has merely requested necessary disclosures to ensure transparency and fairness.

Additionally, the Plaintiff served PLAINTIFF'S FIRST SET OF DISCOVERY REQUESTS- Fri 14 Mar, 12:14 (3 days ago). A few hours later- Fri 14 Mar, 17:43 (3 days ago), Riot's Legal Team falsely claimed that I was refusing to cooperate and filed a notice with the court which the Plaintiff is still yet to be able to access. Again, this follows the same pattern of pressure, intimidation lies and manipulation, further evidencing the need for the prerequisite obligations. Their actions show a disrespect for the court and a disregard for honesty in proceedings.

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I. PREREQUISITE DISCLOSURES REQUIRED FROM DEFENDANT

Plaintiff has previously communicated reasonable and necessary preconditions to ensure that the settlement process is conducted in good faith and not as a procedural delay tactic.

1. Full Disclosure of Riot's Insurance Coverage Policy

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(iv), Riot must disclose any applicable insurance policy that may cover the claims in this case. The plaintiff has specifically requested:

The complete insurance policy document.

The policy limits, deductibles, and retention amounts.

Communications between Riot Games and its insurers regarding this lawsuit, including settlement discussions and defense strategy.

Proof of Riot's notification to insurers regarding this litigation.

Despite multiple requests, Riot has failed to comply with this required disclosure, undermining the credibility of any potential settlement discussions.

2. Response to Plaintiff's Second Amended Complaint (SAC)

Riot has not yet filed a formal response to the SAC. Without a clear statement of Riot's legal position on the claims asserted, there is no proper foundation for settlement negotiations.

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2 3. Confirmation of Good-Faith Negotiations
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5 Riot must affirm in writing that it is willing to negotiate in good faith and not use
6 the settlement conference as a mere legal formality, delay tactic, or other procedural
7 manipulation. Riot's refusal to provide such confirmation raises serious concerns about bad-faith
litigation practices.

8
9 4. Cessation of Procedural Manipulation & Retaliatory Conduct
10

11 Riot must immediately cease procedural tactics designed to exhaust, intimidate, or
12 unfairly pressure Plaintiff into an unfavorable resolution. These tactics include the deliberate
13 misrepresentation of Plaintiff's position to the Court, falsely claiming that Plaintiff is refusing to
14 engage in the settlement process.

II. RIOT'S DELIBERATE ATTEMPTS TO MANIPULATE COURT PROCEEDINGS

Plaintiff brings to the Court's attention that Riot's legal team has intentionally provided false information to the Court to manipulate and distort legal proceedings in an attempt to coerce Plaintiff into a premature settlement conference without the necessary disclosures.

False Representation of Plaintiff's Position

Riot's legal team has falsely stated that Plaintiff is "refusing" to engage in the Court-ordered settlement conference. This is blatantly untrue. Plaintiff has clearly expressed willingness to engage in good-faith negotiations once Riot fulfills its own obligations under Rule 26 and provides necessary disclosures to make the process meaningful.

Attempting to Force a Settlement Conference Prematurely

Riot is deliberately attempting to rush the scheduling of the settlement conference before addressing outstanding discovery issues, despite the fact that these issues are fundamental to any settlement discussions.

1 Deliberate Misuse of the Settlement Process

2 Riot's tactics indicate that it is not engaging in the settlement process in good
3 faith but rather attempting to use the conference as a procedural tool to delay proper discovery
4 and intimidate Plaintiff into accepting an unfair resolution.

5

6

7 Misrepresenting the Role of the Magistrate Judge

8 Riot's legal team has implied that the Magistrate Judge is merely facilitating the
9 settlement conference and has no authority over the case, while simultaneously attempting to
10 pressure Plaintiff into a premature conference without the necessary disclosures. This
11 misrepresentation of judicial procedure is yet another example of Riot's deliberate bad-faith
12 conduct.

13

14

15 **III. RELIEF REQUESTED**

16 Accordingly, Plaintiff respectfully requests that this Court:

17 Order Riot Games to immediately comply with its disclosure obligations under
18 Rule 26(a)(1)(A)(iv) by providing full insurance policy details.

19

20 Require Riot Games to submit its formal response to the Second Amended
21 Complaint (SAC) before any settlement discussions commence.

22

23 Require Riot Games to confirm in writing that it will negotiate in good faith and
24 not use the settlement process as a delay tactic or procedural maneuver.

1 Sanction Riot's legal team for making deliberate false statements to the Court,
2 misrepresenting Plaintiff's position, and attempting to manipulate legal proceedings.
3
4

5 Stay the scheduling of the settlement conference until Riot complies with these
6 necessary conditions.
7
8

IV. CONCLUSION

9 Plaintiff is not refusing to participate in the settlement conference but instead
10 demands basic procedural fairness and transparency before engaging in discussions. Riot's
11 refusal to comply with required disclosures and its deliberate misrepresentation of facts to the
12 Court undermine the legitimacy of the settlement process.

13
14 Plaintiff urges this Court to take appropriate action to ensure that Riot Games acts
15 in good faith and ceases its deliberate attempts to manipulate the legal process.
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Declaration,

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 17, 2025, in Coventry, England.

Signature: M.WOLSTENHOLME

Marc Wolstenholme

Plaintiff in Pro Per

5 Shetland Close

Coventry, England CV5 7LS

marc@mwwolf-fiction.co.uk

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1 EXHIBITS.
2

3 **EXHIBIT A – THREAD OF EMAILS AS EVIDENCE OF MANIPULATION AND LIES.**

4 **Settlement Conference scheduling**

5 External

6 Inbox

7 Search for all messages with label Inbox

8 Remove label Inbox from this conversation

9 Summarise this email

10 G

11 **Geller, Joshua**

12 Mar 2025,
21:44 (5 days
ago)

13 to me, Aaron

14 Hi Marc,

15 As you'll recall, the parties were ordered to complete a settlement conference by June
16 6, 2025 (see the Court's scheduling order, Docket No. 66 at page 12). As instructed,
17 we reached out to the Magistrate Judge's court clerk to get available dates. Judge
18 Mircheff sets settlement conferences on Thursdays at 10:00 a.m. PT, and asked us to
19 submit our availability.

20 We are available for a settlement conference on the following dates: April 3, April 17,
21 April 24.

22 Can you please confirm if those work for you? I will confirm with the court clerk that you
23 will be able to appear remotely.

24 Thanks,
25 Josh

26 **Joshua Geller**
27 Partner

28 9

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1 [Biography](#) | [vCard](#)
2 310.201.7460 Direct
jgeller@greenbergglusker.com

3 **Greenberg Glusker LLP**
4 2049 Century Park East, Suite 2600
Los Angeles, CA 90067
[GreenbergGlusker.com](#)

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6 within the attorney client privilege. If you have received this message in error, please immediately notify the sender at
Greenberg Glusker and delete all copies of this email message along with all attachments. Thank you.

7 M
8

9 **Marc Wolstenholme <marc@mwwolf-fiction.co.uk>**

Wed 12 Mar,
22:12 (5 days
ago)

10 to Joshua
11

12 **Re: Settlement Conference Scheduling**
13

14 Dear Josh,

15 I hope you had a lovely time with your baby.

16 Before discussing settlement conference dates, I want to reiterate that I do not agree to
17 a Magistrate Judge presiding over this matter, as previously addressed in the discovery
report. I'm not in agreement to discuss or change this.

18 Additionally, I am still waiting for the insurance disclosure and for my prerequisite
19 requirements to be acknowledged and agreed upon. These must be addressed before I
20 consider any settlement discussions.

21 For now, I will continue to break down the episodes and will be moving into formal
22 discovery as of Monday, March 17th. Please ensure that all relevant materials are
23 preserved accordingly, and the additional people know that I am likely to bring more
defendants into these proceedings with additional cases.

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1 I expect these matters to be handled appropriately, please do not come back trying to
2 manipulate or ignore my requests. Let me know once the outstanding issues are
properly addressed.

3

4

5 Many Thanks,

6

7 Marc

8

G

9 Geller, Joshua

Wed 12 Mar,
23:05 (5 days
ago)

10 to Aaron, me

11 Thank you Marc.

12 Both parties have been ordered to conduct this Settlement Conference by the Court. I am
13 attaching the order, and the relevant portion is below:

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14 We have contacted the settlement officer as we were instructed and were asked to confer with
you on dates. That's why I reached out.
15 To clarify: the Magistrate Judge is not presiding over this matter. The Magistrate Judge is for
16 the conduct of the settlement conference only, as ordered by the Court.
17 We will proceed with discovery and all other aspects of the case as required by the Federal
18 Rules, including responding to the discovery you plan to serve. Riot is complying with, and will
continue to comply with, its preservation obligations.
19 We need to get back to the Court with available dates to get the Settlement Conference on
20 schedule. You will be able to proceed with discovery as you see fit while that process is going
on. But at the end of the day, we all have to comply with the Court's order.
21 So with that said, please let me know if April 3, April 17, April 24 work as options so we can get
22 back to the settlement officer with those.

23 Best,
24 Josh

25 **One attachment • Scanned by Gmail**

26 **12**

27 PLAINTIFF MARC WOLSTENHOLME'S NOTICE TO COMPLY WITH PREREQUISITE REQUIREMENTS
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1
2 M
3

Marc Wolstenholme <marc@mwwolf-fiction.co.uk>

Wed 12 Mar,
23:01 (5 days
ago)

4 to Joshua
5

6 Prerequisite Requirements for Settlement Discussions
7

8 Before engaging in any settlement negotiations, Riot Games must satisfy the following
9 conditions to demonstrate good faith and compliance with legal obligations. If Riot does
10 not agree, I will accept an explanation of why and consider dropping the ones Riot does
11 not agree to. Once we have the answers, I will be in a better position to timetable in a
settlement conference. Right now, the cases are not in a position to book a settlement
conference.

12 1. Full Disclosure of Insurance Policy & Coverage Details
13 As per Federal Rule of Civil Procedure 26(a)(1)(A)(iv) and the Joint Rule 26(f) Report,
14 Riot must provide full disclosure regarding any applicable insurance coverage for this
litigation, including:

15 Complete insurance policy documents applicable to the claims in this case.
Policy limits, deductibles, and retention amounts.

16 Any communications between Riot Games and its insurers regarding this lawsuit,
including settlement discussions and defense strategy.

17 Confirmation of whether Riot's insurers are involved in settlement negotiations.

18 Proof of Riot's notification to insurers regarding this litigation.

19 Failure to disclose this information will be treated as bad-faith conduct, preventing
meaningful settlement discussions.

20 2. Personal Apology from Leadership
21 A direct and private apology for the harm caused to me as a human being- not just as a
litigant-is a necessary step for closure and resolution.

23 This apology must come from one of the following individuals:

24 Marc Merrill (Tryndamere)

Brandon Beck

25 13
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1 Alex Yee or Christian Linke (the "Showrunners")
2 Dylan Jadeja (New CEO)
3 A corporate statement will not suffice. This is about accountability and healing, not
4 optics.
5 No apology = No settlement.

6 3. Confirmation of Good-Faith Negotiations & Intent to Settle
7 Riot must confirm, in writing, that it is willing to negotiate in good faith and that the
8 settlement conference is not being used as a legal formality, delay tactic, or other
9 procedural manipulation.
10 If Riot is unwilling to commit to genuine settlement efforts, I will not waste time engaging
11 in a meaningless process.
12 This is a requirement, not a request.

13 Formal Reply to the Second Amended Complaint (SAC)
14 Riot must respond to the SAC before settlement discussions commence.
15 Without a clear statement of Riot's position, there is no basis for negotiating settlement
16 terms.
17 A settlement requires clarity, not ambiguity.

18 5. Cessation of Procedural Manipulation & Retaliation
19 Riot Games must stop all procedural manipulation and bad-faith legal tactics designed
20 to exhaust or intimidate me into an unfair resolution.
21 Any continued attempts to delay, obscure, or unfairly influence proceedings will result in
22 formal legal action against responsible parties.
23 Transparency and fairness are non-negotiable.

24 6. Alignment on Settlement Expectations
25 If Riot is open to settlement, there must be preliminary discussions on financial and non-
26 financial terms to ensure we are operating within realistic parameters.
27 If Riot's position is drastically out of line with what is fair, a settlement conference is a
28 waste of time.
I will not participate in performative negotiations.

29 7. Disclosure of Any Involvement from Jonny Geller, Felicity Blunt, CBG, and UTA
30 Riot must disclose any and all involvement from:
31 Jonny Geller (Curtis Brown Group)
32 Felicity Blunt (CBG & UTA)
33 United Talent Agency (UTA)
34 Any related third parties involved in literary, media, or business dealings regarding this

1 case

2 Riot has engaged with these individuals or agencies, I require full transparency on their
role and any discussions that may have taken place.

3 Failure to disclose = Deliberate concealment = Bad-faith litigation.

4 Additional Prerequisite Conditions to Consider:

5 8. Mandatory Preservation of Evidence (Litigation Hold)

6 Riot must confirm in writing that it has placed a litigation hold on all relevant evidence
related to this case.

7 This includes, but is not limited to:

8 Internal communications (emails, Slack, messages, etc.) about Arcane, Bloodborg, and
any related IP concerns.

9 Documents, notes, and mood boards from Fortiche Production SAS related to
character, scene, and script development.

10 Animation drafts, reference materials, and concept art used in Arcane's production.

11 All AI or software-based writing tools used in Arcane's development.

12 Communications between Riot and third-party agencies (UTA, Curtis Brown, Felicity
Blunt, etc.).

13 Any spoliation (destruction) of evidence will result in immediate legal action.

14 This prevents Riot from deleting or concealing evidence before discovery.

15 9. Immediate Response to Outstanding Requests (Including Insurance & SAC Reply)

16 Riot must respond to all previously requested disclosures, including the insurance policy
details and the formal reply to the Second Amended Complaint (SAC).

17 If Riot refuses to provide these materials, they must state why in writing.

18 No settlement discussion can occur without these fundamental disclosures.

19 This prevents Riot from stalling by delaying required disclosures.

20 10. Confirmation That Riot Will Not Attempt to Retaliate or Intimidate

21 Riot must formally confirm that it will not engage in retaliation, witness intimidation, or
legal bullying tactics.

22 This includes:

23 Targeting third parties (e.g., agencies, publishers, or legal advisors) to interfere with the
case.

24 Engaging in corporate harassment through legal or extralegal means.

25 Manipulating the legal process with excessive motions or delay tactics.

26 Any breach of this will be treated as a separate legal matter and reported accordingly.

27 This forces Riot to act responsibly and prevents backdoor pressure tactics.

1 11. No Bad-Faith "Lowball" Offers or Insulting Settlement Terms

2 Riot must confirm it is approaching settlement with legitimate intent and not as a lowball
strategy to evade consequences.

3 If Riot's offer is deliberately insulting or unserious, I reserve the right to escalate the
case instead of wasting time.

4 Baseline expectations for financial and non-financial settlement terms must be
discussed in advance to avoid a wasteful conference.

5 If Riot is unserious, there's no point in engaging in talks.

6 12. Independent Third-Party Mediation If Riot Wants a Settlement Conference

7 If Riot insists on a settlement conference, I require a neutral third-party mediator rather
than a Magistrate Judge.

8 This ensures a fair and impartial process, rather than a legal formality that favors Riot.
9 This prevents Riot from using procedural manipulation in the settlement process.

10 Final Statement

11 These prerequisite requirements must be formally acknowledged and satisfied before
any meaningful settlement discussions can proceed. If Riot Games refuses to comply, I
12 will assume they are not serious about resolution and will continue with discovery and
litigation as planned.

13 Failure to meet these conditions will make further discussions pointless. I expect a
14 timely response confirming Riot's compliance with these requirements, or reason to the
15 one's it does not agree to.

16 As soon as I have answers, I will look at the dates, until then, It's pointless as the case
17 is not where it needs to be. I do not wish a back and forth.

18 Many Thanks,
19 Marc Wolstenholme

20 G

21 Geller, Joshua

14 Mar 2025,
17:43 (3 days
ago)

22 to Aaron, me

23 Marc,

25 16

26 PLAINTIFF MARC WOLSTENHOLME'S NOTICE TO COMPLY WITH PREREQUISITE REQUIREMENTS
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1 Riot does not agree to any "prerequisites." The Court ordered both parties (which includes you)
2 to participate in the settlement conference process. Because you are refusing to do so, we
3 intend to raise that refusal with the court immediately, given the upcoming deadline to get a
settlement conference on calendar.
4

5 Please let me know if you change your mind and are willing to provide your availability. As a
reminder, the settlement officer schedules these conferences on Thursdays, and Riot is
available April 3, April 17, and April 24.

6 M

7 **Marc Wolstenholme <marc@mwwolf-fiction.co.uk>**

15 Mar 2025,
13:53 (2 days
ago)

8 to Joshua
9

10 I'm not refusing, stop lying and manipulating,

11 I'm saying it's premature. you can tell them that i'm refusing and I'll file the
12 message showing that you are lying.

13 Again, it's pointless unless Riot agrees to use the Conference for its intended purpose,
14 which is to say settlements.

15 Josh, if you are gonna try and force me and lie, do not message me.

16 Also, I've had an email but the court system isn't working, I can not access the
17 document.

18 M

19 **Marc Wolstenholme <marc@mwwolf-fiction.co.uk>**

15 Mar 2025,
15:28 (2 days
ago)

20 to dan.chang, Online, cacd_ecfmail, Joshua
21

23 **Subject: RE: Settlement Conference Scheduling**

24 Dear Josh and Court Clarks,

25 1 /

26 PLAINTIFF MARC WOLSTENHOLME'S NOTICE TO COMPLY WITH PREREQUISITE REQUIREMENTS
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1 I am, ho I would like to reiterate that I am not refusing to participate in the settlement
2 conference. wever, maintaining that the conference should serve its intended purpose,
3 which is to facilitate genuine settlement discussions rather than being used as a
procedural formality.

4 My position remains that without necessary disclosures- including insurance policy
5 details, a response to the Second Amended Complaint, response to discovery, and
6 confirmation that Riot is approaching this process in good faith- a settlement conference
7 at this stage is premature and unproductive. If Riot is unwilling to commit to negotiating
in good faith, then there is no point in scheduling a conference merely for compliance
with court deadlines.

8 If you choose to misrepresent my stance to the Court, I will file the full email
9 correspondence as evidence that Riot is attempting to pressure me into an insincere
settlement discussion while withholding critical disclosures.

10 Additionally, I have received a court notification but am unable to access the document
11 due to technical issues with the court system. If you have received the document in
12 question, I request that you forward a copy to me.

13 It looks to be a Notice. If you have filed a notice of refusal as threatened, this can
14 clearly be shown to be direct lies and manipulation to the court and I will be asking for
penalties against you.

15 If Riot genuinely wishes to settle, then I am open to setting dates after the prerequisite
16 issues are properly addressed. I expect transparency and fairness in this process, not
17 pressure tactics and manipulation.

18 Sincerely,

19 Marc Wolstenholme

1 **Declaration,**

2 I declare under penalty of perjury under the laws of the United States that the foregoing is true
3 and correct.
4

5

6 Executed on March 17, 2025, in Coventry, England.

7

8 Signature: *M.WOLSTENHOLME.*

9

10 Marc Wolstenholme

11

12 Plaintiff in Pro Per

13 5 Shetland Close

14 Coventry, England CV5 7LS

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26 PLAINTIFF MARC WOLSTENHOLME'S NOTICE TO COMPLY WITH PREREQUISITE REQUIREMENTS
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